

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE CTI BIOPHARMA CORP.
SECURITIES LITIGATION

Case No. 2:16-cv-00216-RSL

Hon. Robert S. Lasnik

**STIPULATION AND [PROPOSED]
ORDER FOR STAY OF PROCEEDINGS**

1 **TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 1. On November 8, 2016, Lead Plaintiffs, DAFNA LifeScience, LP and DAFNA
3 LifeScience Select, LP (“DAFNA”) and additional plaintiff Michael Li (with Lead Plaintiffs,
4 “Plaintiffs”) filed a Consolidated Class Action Complaint (ECF No. 65) (the “Complaint”).

5 2. On January 9, 2017, Defendants filed motions to dismiss the Complaint (ECF No.
6 85), which remain pending.

7 3. On August 3, 2017, counsel for the Lead Plaintiffs and counsel for the CTI
8 Defendants notified the Court that, following mediation and extensive negotiations, the Parties
9 have reached an agreement to settle this class action and executed a confidential term sheet. The
10 Parties are now preparing a detailed Stipulation of Settlement.

11 4. The Settlement is subject to Court approval pursuant to Fed. R. Civ. P. 23(e).

12 5. The Parties have agreed to submit, by September 1, 2017, their Stipulation of
13 Settlement and Motion for Preliminary Approval.

14 6. In light of the foregoing, the Parties request a stay of the current proceedings
15 before the Court, other than those relating to the resolution of the forthcoming motion for
16 approval of the settlement.

17 **THEREFORE**, the Parties request that the Court enter an order:

18 1. Staying the current proceedings before the Court other than those relating to the
19 resolution of the forthcoming motion for approval of the settlement.

20 2. Directing the Parties to submit by September 1, 2017 the Stipulation of Settlement
21 and Motion for Preliminary Approval.

22 Dated: August 4, 2017

Respectfully submitted,

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24 By: /s/ Roger M. Townsend

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3 *Local Counsel for Plaintiffs and the Class*

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15 *Counsel for Lead Plaintiff DAFNA and Additional*
16 *Plaintiff Michael Li and Lead Counsel for the Class*

17 Dated: August 4, 2017

18 By: /s/ Jeffrey W. Kilduff

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24 *Counsel for Defendants*

25 Dated: August 4, 2017

26 By: /s/ Thomas P. Swigert

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Counsel for Underwriter Defendants

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2017

HONORABLE ROBERT S. LASNIK
UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 4, 2017, I electronically filed the foregoing paper with the
3 Clerk of the Court using the ECF system which will send notification of such filing to the email
4 addresses denoted on the Electronic Mail Notice List.

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6 /s/ David R. Stickney
7 DAVID R. STICKNEY
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